

December 19, 2006

By E-File

Ms. Marlene H. Dortch  
Federal Communications Commission  
445 12th St. SW, Room TW-B204  
Washington, DC 20554

Re: Impsat Fiber Networks, Inc. /Global Crossing Limited  
WC DK No. 06-215  
ITC-T/C-20061128-00533

Dear Ms. Dortch:

The Department of Homeland Security ("DHS"), with the concurrence of the Department of Justice, including the Federal Bureau of Investigation ("FBI"), request that the Federal Communications Commission ("Commission") defer action on the applications of Impsat Fiber Networks, Inc. and Global Crossing Limited (together "Applicants") to transfer control of domestic and international section 214 authorizations under section 214 of the Communications Act of 1934 held by Impsat USA, Inc., which is the authorized U.S. international and domestic carrier subsidiary of Impsat Fiber Networks Inc., to Global Crossing Limited. We ask that the FCC defer these actions until such time as DOJ, FBI, and DHS (i) notify the Commission that potential national security, law enforcement, and public safety issues raised by the application have or have not been resolved, and (ii) on that basis, request appropriate action by the Commission. Necessarily, DOJ, FBI, and DHS also request that the Commission remove the application from streamlined processing.

After receiving notice of the applications, DOJ, FBI, and DHS have been in contact with the Applicant to request information related to national security, law enforcement, and public safety concerns. The company has responded to those requests, but DOJ, FBI, and DHS are still analyzing those responses and are not yet in a position to communicate our position to the

FCC, DOJ, FBI, and DHS will conduct their review expeditiously and advise the Commission promptly upon its completion.

Thank you for your consideration.

Sincerely,

/s/ STEWART A. BAKER

Stewart A. Baker  
Assistant Secretary for Policy  
United States Department of Homeland  
Security

cc: Impsat Fiber Networks, Inc.  
Global Crossing Limited  
Cecilia Seppings  
Gail Cohen  
Susan O'Connell  
James Bird  
George Li  
Lou Brenner  
Lonnie Kishiyama  
Teresa Baer